

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

SEALED
INDICTMENT

- v. - :

14 Cr.

MOSHE MIRILISHVILI, :

DAMON LEONARD, :

JOMARIS JAVIER, :

RAY WILLIAMS, :

a/k/a "Obama," :

DORIAN AVERY, :

a/k/a "Bo," :

TASHEEN DAVIS, :

a/k/a "Hollywood," :

GANEENE GOODE, :

a/k/a "Big Gina," :

THOMAS WHITE, :

a/k/a "Black," :

CAROLYN MIDDLETON, :

JOSEPH GRAY, :

a/k/a "Dogs," :

KEVIN FRYE, :

a/k/a "Pretty Kev," :

a/k/a "PK," :

Defendants. :

- - - - - X

COUNT ONE
(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

Introduction

1. From in or about January 2012, up to and including in or about December 2014, in the Southern District of New York and elsewhere, MOSHE MIRILISHVILI, DAMON LEONARD, JOMARIS JAVIER, RAY WILLIAMS, a/k/a "Obama," DORIAN AVERY, a/k/a

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"Bo," TASHEEN DAVIS, a/k/a "Hollywood," GANEENE GOODE, a/k/a "Big Gina," THOMAS WHITE, a/k/a "Black," CAROLYN MIDDLETON, JOSEPH GRAY, a/k/a "Dogs," and KEVIN FRYE, a/k/a "Pretty Kev," a/k/a "PK," the defendants, and others known and unknown, conspired to distribute more than a million pills of the Schedule II controlled substance Oxycodone, a highly addictive pain medication available by prescription only.

2. As detailed further below, the scheme was centered at purported medical offices in Manhattan and the Bronx, including the office of MOSHE MIRILISHVILI, the defendant (the "Clinic"), where MIRILISHVILI, a Board certified, state licensed doctor, wrote thousands of medically unnecessary prescriptions for large quantities of oxycodone in return for cash payments. Once written, these prescriptions were then filled at pharmacies by other co-conspirators who, in turn, resold and distributed these illegitimately and unlawfully obtained oxycodone tablets at significantly inflated prices.

3. In total, between in or around October 2012 and in or around December 2014, MOSHE MIRILISHVILI, the defendant, wrote more than 13,000 medically unnecessary prescriptions resulting in the unlawful distribution of nearly 1.2 million oxycodone tablets and for which MIRILISHVILI collected nearly \$2.6 million in cash payments.

BACKGROUND ON OXYCODONE

4. Oxycodone, a highly addictive, narcotic-strength opioid is used to treat severe and chronic pain conditions, such as post-operative pain, severe back and orthopedic injuries, as well as pain associated with certain forms of cancer and other terminal illnesses. Oxycodone can be legitimately obtained from most pharmacies with a prescription written by a treating physician, and is typically dispensed in 5 to 30 milligram tablets to patients.

5. Every year more than 13 million Americans abuse oxycodone, with the misuse of prescription painkillers such as oxycodone leading to as many as 500,000 annual emergency room visits. As a result, the distribution of oxycodone is heavily regulated. For example, prescriptions for oxycodone cannot exceed a 30-day supply, and cannot allow for "refills." Instead, a patient who has exhausted his or her initial prescription must see his or her doctor again each month and be re-evaluated before obtaining a new prescription from the doctor. Similarly, to curb any potential for abuse, pharmacies are required to track and report all prescriptions filled for oxycodone, and by law, no patient is supposed to be able to fill a prescription for oxycodone more than once every 30 days, even if written by a different doctor.

6. Oxycodone prescriptions have enormous cash value to drug dealers. Oxycodone prescriptions can be filled at virtually any pharmacy and the oxycodone tablets can then be resold on the street for thousands of dollars. For example, thirty milligram oxycodone tablets have a street value of approximately \$30 per tablet in New York City, with prices ranging even higher in other parts of the country such as Massachusetts, Vermont, and Maine. In other words, a single prescription for 90 30-milligram tablets of oxycodone can net the distributor \$2,700 in cash or more.

THE SCHEME TO DISTRIBUTE OXYCODONE

7. The defendants charged herein collectively made millions of dollars through a scheme to write and fill thousands of medically unnecessary prescriptions for oxycodone, before reselling those unlawfully obtained pills at high prices to individuals addicted to oxycodone, among others.

8. Essential to this illegal distribution conspiracy are corrupt, Board certified, state licensed doctors like MOSHE MIRILISHVILI, the defendant, who, in exchange for cash, was willing to write medically unnecessary prescriptions for large quantities of oxycodone. MIRILISHVILI operates out of a purported medical office - i.e., the Clinic - and charges cash fees for his participation in the scheme. Specifically, MIRILISHVILI typically charges approximately \$200 in cash -

insurance is rarely, if ever, accepted - for "doctor visits" that usually involve little physical examination and almost always result in the issuance of a prescription for large doses of oxycodone, typically 90 30-milligram tablets. To protect against the possibility of detection by law enforcement, MIRILISHVILI sometimes asks the "patients" for medical documentation, such as MRI reports, purporting to document injuries, or urinalysis reports purporting to show that the "patient" was taking oxycodone (and thus not obtaining it for the purpose of distribution). As discussed below, fake MRI reports and urinalysis reports were sold by members of the conspiracy to "patients," typically inside or nearby the Clinic.

9. The Clinic attracts a high volume of "patients," who came to see MOSHE MIRILISHVILI, the defendant, and to get a prescription for oxycodone. The overwhelming majority of these individuals have no medical need for oxycodone, nor any legitimate medical record documenting an ailment for which oxycodone would be prescribed. Instead, most of these individuals were members of "crews" (the "Crew Members") - that is, they were recruited and paid by large-scale oxycodone distributors (the "Crew Chiefs") to pose as "patients" in order to receive medically unnecessary prescriptions from MIRILISHVILI.

10. To facilitate these visits, Crew Chiefs provide their Crew Members with the cash fees that MOSHE MIRILISHVILI, the defendant, requires, which, as noted are typically \$200 per "patient," and after the Crew Members obtained a medically unnecessary oxycodone prescription from MIRILISHVILI, the Crew Chiefs then arrange for these Crew Member to fill the oxycodone prescription at a nearby pharmacy - that is to obtain the oxycodone tablets - which the Crew Chiefs then take possession of and ultimately resell. Crew Members were paid by Crew Chiefs for their services and for obtaining and handing over the oxycodone tablets they obtained as a result of their visit to the Clinic.

11. Crew Chiefs also paid certain of the Clinic's employees (the "Office Staff") hundreds of dollars in cash at a time to get their Crew Members into the Clinic to see MIRILISHVILI. In particular, the Office Staff typically profited by selling fake MRI reports, urine samples or urinalysis reports to these "patients" and Crew Chiefs. The Office Staff similarly profited by selling oxycodone prescriptions or loose pills directly to Crew Chiefs. Many of these transactions occurred inside the Clinic.

The Additional Clinics

12. To maximize their profits, Crew Chiefs frequently sent Crew Members to see not only MOSHE MIRILISHVILI, the

defendant, but also other doctors who ran similar fraudulent medical practices and who would similarly write medically unnecessary prescriptions for large doses of oxycodone in exchange for cash payments. For example, many of the Crew Chiefs who participated in this scheme also sent "patients" to a similar fraudulent clinic on Southern Boulevard (the "Southern Boulevard Office") where a doctor not named as a co-conspirator herein ("DOCTOR-2") saw dozens of "patients" each day - many of them Crew Members working for Crew Chiefs - before writing each of these "patients" medically unnecessary prescriptions for a large quantity of oxycodone. Between June 2012 and January 2014, DOCTOR-2 wrote more than 17,000 oxycodone prescriptions, averaging several hundred oxycodone prescriptions per week, and writing as many as 126 oxycodone prescriptions in a single day.

13. Crew Chiefs participating in this scheme also sent Crew Members to see another doctor not named as a defendant herein ("DOCTOR-3") who ran a similar fraudulent medical practice in Upper Manhattan (the "Doctor-3 Office"). As that Office's sole licensed practitioner, DOCTOR-3 saw all of the Office's "patients" - dozens of individuals each day, many of them Crew Members working at the direction of Crew Chiefs - before writing each of them a medically unnecessary prescription for a large quantity of oxycodone. Between in or around January 2012 and in or around December 2014, DOCTOR-3 wrote more than

15,000 oxycodone prescriptions, averaging more than one hundred prescriptions a week, and writing as many as 59 oxycodone prescriptions in a single day.

The Defendants' Participation in the Drug Distribution Conspiracy

14. As discussed in part above, a variety of individuals played distinct roles in the conspiracy.

The Mirilishvili Clinic

a. At various times relevant to this Indictment, MOSHE MIRILISHVILI, the defendant, was a licensed medical doctor and the owner and operator of the Clinic, which is located on 162nd Street in Manhattan. In that capacity, MIRILISHVILI oversaw the day-to-day operations at the Clinic, including hiring and supervising the Office Staff, and collecting the thousands of dollars in cash payments the Clinic received daily. As the Clinic's sole licensed practitioner, MIRILISHVILI saw all of the Clinic's "patients" - dozens of individuals each day, many of them Crew Members working at the direction of Crew Chiefs - personally collecting a \$200 cash fee from each of these "patients" before writing each of them an identical prescription for 90 30-milligram oxycodone tablets. Indeed, MIRILISHVILI was so dependable, the Clinic was referred to by co-conspirators as the "90 spot." Between in or around October 2012 when MIRILISHVILI first opened the Clinic and in or around

December 2014, MIRILISHVILI wrote nearly 14,000 oxycodone prescriptions, averaging more than one hundred prescriptions a week, and writing as many as 46 identical 90-tablet prescriptions in a single day.

b. At various times relevant to this Indictment, DAMON LEONARD and JOMARIS JAVIER, the defendants, held various titles, including "office manager," at the Clinic. LEONARD and JAVIER both used their roles as Office Staff to control access to MIRILISHVILI and the medically unnecessary prescriptions he wrote, reaping thousands of dollars themselves by charging Crew Chiefs cash fees - typically several hundred dollars or more - to generate fake MRI reports, fake urinalysis reports, or otherwise facilitate "patient visits" so that the Crew Chiefs could obtain and then fill medically unnecessary prescriptions.

The "Crew Chiefs"

c. At various times relevant to this Indictment, RAY WILLIAMS, a/k/a "Obama," the defendant, was a Crew Chief who recruited and paid dozens of his own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which WILLIAMS then resold for profit. While WILLIAMS and his Crew operated at multiple clinics, WILLIAMS was one of the most active Crew Chiefs operating at the Clinic, bringing in approximately 30 "patients" each month to obtain medically unnecessary prescriptions from MIRILISHVILI.

d. At various times relevant to this Indictment, DORIAN AVERY, a/k/a "Bo," the defendant, was a Crew Chief who recruited and paid dozens of his own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which AVERY then resold for profit. AVERY and his Crew operated at multiple clinics, including the Clinic and the Southern Boulevard Office, bringing approximately 20-30 "patients" each month to obtain medically unnecessary prescriptions from MIRILISHVILI.

e. At various times relevant to this Indictment, TASHEEN DAVIS, a/k/a "Hollywood," the defendant, was a Crew Chief who recruited and paid more than a dozen of her own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which DAVIS then resold for profit. DAVIS and her Crew operated at multiple clinics, including the Clinic and the Southern Boulevard Office, bringing more than a dozen "patients" each month to obtain medically unnecessary prescriptions from MIRILISHVILI. As part of her participation in the scheme, DAVIS also frequently posed as a "patient" herself, simultaneously obtaining medically unnecessary prescriptions for large quantities of oxycodone each month from both MIRILISHVILI and DOCTOR-2, among others.

f. At various times relevant to this Indictment, GANEENE GOODE, a/k/a "Big Gina," the defendant, was a Crew Chief

who recruited and paid more than a dozen of her own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which GOODE then resold for profit. GOODE and her Crew operated at multiple clinics, including the Doctor-3 Office, the Southern Boulevard Office, and the Clinic, bringing more than a dozen "patients" each month to obtain medically unnecessary prescriptions from MIRILISHVILI.

g. At various times relevant to this Indictment, THOMAS WHITE, a/k/a "Black," the defendant, was a Crew Chief who recruited and paid dozens of his own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which WHITE then resold for profit. While WHITE and his Crew operated at multiple clinics, including the Doctor-3 Office, the Southern Boulevard Office, and the Clinic, WHITE was one of the most active Crew Chiefs operating at the Clinic, bringing in approximately 30 "patients" a month to obtain medically unnecessary prescriptions from MIRILISHVILI.

h. At various times relevant to this Indictment, WHITE was assisted by CAROLYN MIDDLETON, the defendant, who, among other things, helped WHITE bring his Crew Members into the clinics and assisted in transporting those Crew Members to area pharmacies so that their prescriptions could be filled and the pills obtained and resold. MIDDLETON, who was paid by WHITE for her work, also posed as a "patient" herself, simultaneously

obtaining medically unnecessary prescriptions for large quantities of oxycodone each month from MIRILISHVILI, DOCTOR-2, and DOCTOR-3, among others.

i. At various times relevant to this Indictment, JOSEPH GRAY, a/k/a "Dogs," the defendant, was a Crew Chief who recruited and paid dozens of his own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which GRAY then resold for profit. While GRAY and his Crew operated at multiple clinics, including the Southern Boulevard Office and the Clinic, GRAY was one of the most active Crew Chiefs operating at the Clinic, bringing in more than 30 "patients" a month to obtain medically unnecessary prescriptions from MIRILISHVILI. As part of his participation in the scheme, GRAY also frequently posed as a "patient" himself, simultaneously obtaining medically unnecessary prescriptions for large quantities of oxycodone each month from MIRILISHVILI and DOCTOR-2, among others.

j. At various times relevant to this Indictment, KEVIN FRYE, a/k/a "Pretty Kev," a/k/a "PK," the defendant, was a Crew Chief who recruited and paid dozens of his own Crew Members for the purpose of obtaining and filling oxycodone prescriptions, which FRYE then resold for profit. FRYE and his Crew operated at multiple clinics, including the Clinic and the Southern Boulevard Office, and FRYE also frequently posed as a

"patient" himself, simultaneously obtaining medically unnecessary prescriptions for large quantities of oxycodone each month from MIRILISHVILI and DOCTOR-2, among others.

STATUTORY ALLEGATIONS

15. From in or about January 2012, up to and including in or about December 2014, in the Southern District of New York and elsewhere, MOSHE MIRILISHVILI, DAMON LEONARD, JOMARIS JAVIER, RAY WILLIAMS, a/k/a "Obama," DORIAN AVERY, a/k/a "Bo," TASHEEN DAVIS, a/k/a "Hollywood," GANEENE GOODE, a/k/a "Big Gina," THOMAS WHITE, a/k/a "Black," CAROLYN MIDDLETON, JOSEPH GRAY, a/k/a "Dogs," and KEVIN FRYE, a/k/a "Pretty Kev" a/k/a "PK," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree, together and with each other, to violate the narcotics laws of the United States.

16. It was a part and an object of the conspiracy that MOSHE MIRILISHVILI, DAMON LEONARD, JOMARIS JAVIER, RAY WILLIAMS, a/k/a "Obama," DORIAN AVERY, a/k/a "Bo," TASHEEN DAVIS, a/k/a "Hollywood," GANEENE GOODE, a/k/a "Big Gina," THOMAS WHITE, a/k/a "Black," CAROLYN MIDDLETON, JOSEPH GRAY, a/k/a "Dogs," and KEVIN FRYE, a/k/a "Pretty Kev" a/k/a "PK," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

17. The controlled substance that MOSHE MIRILISHVILI, DAMON LEONARD, JOMARIS JAVIER, RAY WILLIAMS, a/k/a "Obama," DORIAN AVERY, a/k/a "Bo," TASHEEN DAVIS, a/k/a "Hollywood," GANEENE GOODE, a/k/a "Big Gina," THOMAS WHITE, a/k/a "Black," CAROLYN MIDDLETON, JOSEPH GRAY, a/k/a "Dogs," and KEVIN FRYE, a/k/a "Pretty Kev" a/k/a "PK," the defendants, conspired to distribute and possess with the intent to distribute was mixtures and substances containing a detectable amount of oxycodone, in violation of 21 U.S.C. § 841(b)(1)(C).

OVERT ACTS

18. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between in or around August 2012 and in or around February 2013, in New York, New York, MOSHE MIRILISHVILI and RAY WILLIAMS, a/k/a "Obama," the defendants, spoke by phone approximately 19 times. In each instance, MIRILISHVILI used his home phone to connect with WILLIAMS via a cellphone under WILLIAMS' control.

b. On or about May 3, 2013 and May 28, 2013, at the Clinic in New York, New York and the Southern Boulevard Office in the Bronx, New York, respectively, TASHEEN DAVIS, a/k/a "Hollywood," the defendant, received medically unnecessary

oxycodone prescriptions written in her own name, for a total of 270 30-milligram oxycodone tablets in a single month.

c. On or about May 6, May 14, and May 22, 2013, at the Clinic in New York, New York; the Southern Boulevard Office in the Bronx, New York; and the Doctor-3 Office in New York, New York, respectively, CAROLYN MIDDLETON, the defendant, obtained medically unnecessary oxycodone prescriptions in her own name written by MIRILISHVILI, DOCTOR-2, and DOCTOR-3 for a total of 420 30-milligram oxycodone tablets in a single month.

d. On or about May 10 and May 24, 2013 at the Southern Boulevard Office in the Bronx, New York, and the Clinic in New York, New York, respectively, KEVIN FRYE, a/k/a "Pretty Kev," a/k/a "PK," the defendant, obtained medically unnecessary oxycodone prescriptions in his own name written by DOCTOR-2 and MIRILISHVILI, for a total of 270 30-milligram oxycodone tablets in a single month.

e. On or about June 17 and June 21, 2013 at the Southern Boulevard Office in the Bronx, New York, and the Clinic in New York, New York, respectively, JOSEPH GRAY, a/k/a "Dogs," the defendant, obtained medically unnecessary oxycodone prescriptions in his own name written by DOCTOR-2 and MIRILISHVILI, for a total of 270 30-milligram oxycodone tablets in a single month.

f. In or around July 2013, in Queens, New York, MIRILISHVILI caused a series of cash deposits totaling \$195,800.00 to be made into an account under his control, representing funds collected by MIRILISHVILI at the Clinic that month in exchange for writing medically unnecessary oxycodone prescriptions.

g. On or about October 2, 2013, at the Southern Boulevard Office in the Bronx, New York, FRYE participated in a physical attack on a co-conspirator not named as a defendant herein who was, at the time, a member of the Office Staff ("CC-1"), in retaliation for CC-1's refusal to allow FRYE's Crew Members, all posing as "patients," to cut the line to see DOCTOR-2.

h. On or about January 16, 2014, at the Clinic in New York, New York, MIRILISHVILI wrote a prescription for a confidential source ("CS-1") who was posing as a "patient" and had no medical need for oxycodone. During this "patient visit" CS-1 informed MIRILISHVILI that he/she had "no pain" and then handed MIRILISHVILI \$200 in cash before receiving, in return, a prescription for 90 30-milligram oxycodone tablets.

i. On or about February 20, 2014, CS-1 returned to the Clinic in New York, New York and provided \$400 in cash to JOMARIS JAVIER, the defendant, as payment for assistance in

obtaining "patient visits" with MIRILISHVILI, like the one on January 16, 2014, as described above.

j. On or about January 20, 2014, at the Clinic in New York, New York, MIRILISHVILI wrote 46 prescriptions for oxycodone in a single day, each for 90 30-milligram oxycodone tablets.

k. On or about May 15, 2014, in New York, New York, GANEENE GOODE, a/k/a "Big Gina," the defendant, offered to sell two prescriptions, including an oxycodone prescription, written for "patients" in GOODE's Crew for \$1,440 in cash.

l. On or about July 10, 2014, at the Clinic in New York, New York, DAMON LEONARD, the defendant, told a cooperating witness ("CW-1") that LEONARD works with DORIAN AVERY, a/k/a "Bo," the defendant, and GRAY, among others, to get "patients" in to see MIRILISHVILI. During the same conversation, LEONARD discussed the possibility of selling oxycodone tablets for \$18 per pill.

m. On or about July 23, 2014, at the Clinic in New York, New York, MIDDLETON and THOMAS WHITE, a/k/a "Black," the defendant worked together to get "patients" in to see MIRILISHVILI to obtain medically unnecessary oxycodone prescriptions.

n. On or about September 11, 2014, at the Clinic in New York, New York, LEONARD told CW-1 that AVERY was now working

more directly with JAVIER to get AVERY's "patients" in to see MIRILISHVILI.

o. On or about September 15, 2014, in and around the Clinic in New York, New York, LEONARD brokered the sale of 180 30-milligram oxycodone tablets - all of which were obtained pursuant to medically unnecessary prescriptions written for "patients" by MIRILISHVILI - for \$3,240 in cash.

p. On or about September 16, 2014, in and around the Clinic in New York, New York, WILLIAMS discarded "patient" paperwork prepared by LEONARD and ostensibly documenting urine tests performed on these "patients" whom WILLIAMS had sent in to the clinic to obtain medically unnecessary oxycodone prescriptions from MIRILISHVILI.

q. On or about October 13, 2014, at the Clinic in New York, New York, WILLIAMS told CS-1 that LEONARD could get new "patients" in to see MIRILISHVILI if CS-1 had all of the "paperwork" in order. During the same conversation, LEONARD confirmed to CS-1 that LEONARD would get new "patients" in and would not charge CS-1 for so doing because CS-1 was a friend of WILLIAMS.

r. On or about October 13, 2014, in New York, New York, WILLIAMS drove three of his Crew Members from the Clinic to a pharmacy on Webster Avenue in the Bronx, New York.

s. On or about October 28, 2014, in New York, New York, DAVIS collected multiple Crew Members from the Clinic and drove them to local pharmacies so that their oxycodone prescriptions could be filled.

FORFEITURE ALLEGATION

19. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MOSHE MIRILISHVILI, DAMON LEONARD, JOMARIS JAVIER, RAY WILLIAMS, a/k/a "Obama," DORIAN AVERY, a/k/a "Bo," TASHEEN DAVIS, a/k/a "Hollywood," GANEENE GOODE, a/k/a "Big Gina," THOMAS WHITE, a/k/a "Black," CAROLYN MIDDLETON, JOSEPH GRAY, a/k/a "Dogs," and KEVIN FRYE, a/k/a "Pretty Kev" a/k/a "PK," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

SUBSTITUTE ASSETS PROVISION

20. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 853)



FOREPERSON



PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
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GANEENE GOODE, a/k/a "Big Gina," THOMAS
WHITE, a/k/a "Black," CAROLYN MIDDLETON,
JOSEPH GRAY, a/k/a "Dogs," and KEVIN
FRYE, a/k/a "Pretty Kev" a/k/a "PK,"

Defendants.

SEALED INDICTMENT

14 Cr.

(21 U.S.C. §§ 846 and 853.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.
